



Advocates for Workplace Fairness

March 24, 2025

**Via ECF**

The Honorable Sanket J. Bulsara  
United States District Court for the  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: **Fischer, et al. v. Gov't Emps. Ins. Co. d/b/a GEICO, Case No. 23 Civ. 02848**

Dear Judge Bulsara:

The parties write jointly to respectfully request a modest enlargement of the word count for each party's briefing on Plaintiffs' Motion for Class Certification, set to be filed as a bundled motion on June 11, 2025. Per this Court's Individual Practices Rules, Section VI.E., the word limit for memoranda of law in support or opposition of motions (aside from letter motions) is 8,750 words, and 3,500 words for any reply. *See* Judge Bulsara Individual Practices (Civil) (Jan. 2, 2025). The parties request leave for an additional 500 words for both memoranda of law in support and opposition to the motion (9,250 words each), and an additional 200 words for Plaintiffs' reply (3,700 words total).

Good cause supports this request. The record in this case is voluminous, including extensive written discovery and deposition testimony from 17 witnesses. While brevity in brief-writing is always the goal, record citations themselves expand the word count considerably. The requested increase in word count will allow the parties to more completely present the factual record to the Court.

Accordingly, the parties respectfully request that the Court permit the parties to file opening and opposition briefs containing no more than 9,250 words, and Plaintiffs to file a reply brief of no more than 3,700 words.

Respectfully Submitted,

Michael J. Scimone

C: All Counsel of Record (via ECF)